



Safe Sites of Colorado & Rocky Mountain Remediation Services

## 779 Closure Project

DATE: September 28, 1998

TO: Building 779 Closure Project File (RCRA Closure File)  
*MHC*

FROM: M. H. Conilogue, Bldg. 779 Environmental Technical Advisor, X6152

SUBJECT: PERTINENT INFORMATION REGARDING UNIT #90.43 CLOSURE - MHC-020-98

Concerning RCRA Closures, the Building 779 Decommissioning Operations Plan states: "Final closure of these units will be conducted in accordance with the substantive requirements of the RFETS RCRA Part B Permit....and the RFCA decision document (779 DOP)....." Part X, Section B.7. of said Permit (Record keeping) requires "results of screening activities" to be included in closure records. The following is a description of those screening activities:

\* Water drained from both the outside and inside of Glovebox 860 (water walls) and also the leaded gloves, are not considered part of the interior surface of the Unit and therefore will not be managed as hazardous waste as described in Section #1, Option #1 of the Building 779 DOP.

\* All material removed from the exterior of Glovebox 860 (rubber gaskets, glovebox legs, lead, etc.) is not considered part of the interior surface of the Unit and will therefore not be managed as hazardous waste as described in Section #1, Option #1 of the Bldg. 779 DOP.

Stand alone hazardous waste determinations will be made for each of the aforementioned waste streams.

Also in accordance with Option #1, EPA Codes D003, D004, D005, D006, D007, D008, D009, D010, D011, and F001 shall be attached as a final hazardous waste determination for Glovebox 860 at the time of closure (stripout). However, a visual inspection performed at the time the unit was de-inventoried of hazardous waste and placed in a RCRA stable condition, observed the inside surfaces will meet the criteria of a "clean debris surface" as identified in Part X, Section D.6. "DEBRIS RULE" DECONTAMINATION / Closure Performance Standard. This observation includes the entire interior surface, including glovebox windows.

This observation information will be included in the WEMS database comments section.

MHC

Attachment

cc:

Julia Hamrick  
Ted Hopkins

Waste/Residue Traveler(s)  
Bill Wierzbicki

Kathy Zbryk



ADMIN RECD

IA-B779-A-00070

RES. CONTROL  
INCOMING LTR NO.

0051Z RF 97

DUE DATE  
ACTION



Department of Energy

ROCKY FLATS FIELD OFFICE  
P.O. BOX 928  
GOLDEN, COLORADO 80402-0928

APR 10 1997

97-DOE-05206

Mr. Joe Schieffelin, Unit Leader  
Hazardous Waste Monitoring and Enforcement  
Colorado Department of Public Health and Environment  
4300 Cherry Creek Drive South  
Denver, Colorado 80222-1530

Dear Mr. Schieffelin:

Pursuant to the Site RCRA Part B Permit, Part VIII, Section B.c.iv. and v., and to the Notification to Begin Closure of Three Permitted RCRA Units in Building 779, et al (GRK-282-96), the United States Department of Energy, Rocky Flats Field Office (DOE, RFFO) requests that the RCRA closure of mixed residue glovebox units 90.37 (Room 131, Gloveboxes 131A, 131B, 131D, and 131E), 90.39 (Room 137, Gloveboxes 106-1 through 106-5, NC-7, H106-1, H106-2), and 90.43 (Room 160, Glovebox 860) be deferred until decontamination and decommissioning of Building 779 commences.

The discoloration of the glovebox surfaces in Units 90.37 (Room 131, Gloveboxes 131A, 131B, 131D, and 131E), 90.39 (Room 137, Gloveboxes 106-1 through 106-5, NC-7, H106-1, H106-2) is indicative that the closure performance standard for a clean surface cannot be reasonably attained for the gloveboxes in these units. Unit 90.43 (Room 160, Glovebox 860) previously contained listed hazardous waste, and would require rinsing and sampling to meet the closure performance standard. Due to the configuration of fixed equipment in the glovebox, the extent of radiological contamination present, and possible future use of the glovebox, it would not be cost effective to attempt to achieve clean closure at this time.

At the present time, all RCRA-regulated waste has been removed from all of the gloveboxes, and they have been verified to be empty. This stable configuration poses little if any threat to human health and the environment.

If you have any questions, please contact Lam N. Xuan, of my staff, at (303) 966-3135.

Sincerely,

*Bob Legare*  
Joseph A. Legare  
Assistant Manager  
for Environmental Compliance

Enclosure

cc w/enc:  
C. Gilbreath, CDPHE  
M. McCormick, 94-1/94-3, RFFO  
D. Grosek, RLG, RFFO  
L. Xuan, RLG, RFFO  
R. Leitner, K-H  
M. Conilogue, SSOC  
M. Stanley, LATA  
N. VanTyne, RMRS

DIST.	LTR	ENC
BACON, R.F.		
BENSUSSEN, S.J.		
BRAILS福德, M.D.		
BUHL, T.R.		
BURDGE, L.		
CARD, R.G.		
COSGROVE, M.M.		
COULTER, W.L.		
DERBY, S.		
DIETERLE, S.E.		
FERRERA, D.W.		
GERMAIN, A.L.		
HARDING, W.A.		
HARROUN, W.P.		
HEDAH, T.O.		
HERRING, C.L.		
HILL, J.A.		
MARTINEZ, L.A.		
McANALLY, J.L.		
NORTH, K.	X	
OGG, R.N.		
PARKER, A.		
PHILLIPS, F.J.	X	
RICHARDS, D.W.		
ITO, D.G.		
JOHN, N.B.		
SPEARS, M.S.		
TILLER, R.E.		
TUOR, N.R.		
VOORHEIS, G.M.		
REED, A.B.	X	
KELLY, G.	X	
WRAPP, J.	X	
Leitner, R.	X	
Conilogue, M.	X	
Stanley, M.	X	
VanTyne, N.	X	

COR CONTROL	X	X
ADMN RECORD		
PATS/130G		

Reviewed for Addressee  
Corres. Control RFP

4-14-97 DG  
Date By

Ref Ltr. #

DOE ORDER #